

2. In accordance with the Court's Individual Rules of Practice, attached as Exhibit 1 is a true and correct copy of the Complaint filed in this action, Case No. 1:16-cv-00638, *Banco del Austro, S.A. v. Wells Fargo Bank, N.A.*

3. Attached as Exhibit 2 is a true and correct copy of the Banco del Austro (“BDA”) Customer Due Diligence Database Report, a document exchanged during discovery under the Bates number WF00019286.

4. Attached as Exhibit 3 is a true and correct copy of the Correspondent Banking Agreement between Wells Fargo and BDA, dated February 2, 2011, a document exchanged during discovery under the Bates number BDA00072.

5. Attached as Exhibit 4 is a true and correct copy of the Banco del Austro Compliance Report, a document exchanged during discovery under the Bates number WF00019305.

6. Attached as Exhibit 5 is a true and correct copy of the deposition of Juan Velez in this case, taken on August 10, 2017, at Miami, FL.

7. Attached as Exhibit 6 is a true and correct copy of the Society for Worldwide Interbank Financial Telecommunication (“SWIFT”) 2015 Annual Review, a document exchanged during discovery under the Bates number WF00011579.

8. Attached as Exhibit 7 is a true and correct copy of the SWIFT publication entitled SWIFT: The Global Financial Messaging Provider, a document exchanged during discovery under the Bates number WF00011556.

9. Attached as Exhibit 8 is a true and correct copy of the deposition of Mark Rasch in this case, taken on August 4, 2017, at New York, NY.

10. Attached as Exhibit 9 is a true and correct copy of excerpts from the section of the SWIFT User Handbook entitled SWIFTNet Certificate Administration Guide, a document exchanged during discovery under the Bates number WF00011335

11. Attached as Exhibit 10 is a true and correct copy of excerpts from the section of the SWIFT User Handbook entitled SWIFTNet Service Description, a document exchanged during discovery under the Bates number WF00011390.

12. Attached as Exhibit 11 is a true and correct copy of excerpts from the section of the SWIFT User Handbook entitled SWIFT FIN Service Description, a document exchanged during discovery under the Bates number WF00010811.

13. Attached as Exhibit 12 is a true and correct copy of excerpts from the section of the SWIFT User Handbook entitled SWIFTNet Link 7.0, a document exchanged during discovery under the Bates number WF00011306.

14. Attached as Exhibit 13 is a true and correct copy of excerpts from the section of the SWIFT User Handbook entitled SWIFT FIN Operations Guide, a document exchanged during discovery under the Bates number WF00010710.

15. Attached as Exhibit 14 is a true and correct copy of excerpts from the section of the SWIFT User Handbook entitled SWIFT Network Access Control Guide, a document exchanged during discovery under the Bates number WF00003552.

16. Attached as Exhibit 15 is a true and correct copy of excerpts from the section of the SWIFT User Handbook entitled SWIFT General Terms and Conditions, a document exchanged during discovery under the Bates number WF00011531.

17. Attached as Exhibit 16 is a true and correct copy of excerpts from the section of the SWIFT User Handbook entitled Connectivity to SWIFT – Connectivity Packs, a document exchanged during discovery under the Bates number WF00003590.

18. Attached as Exhibit 17 is a true and correct copy of a guidance document issued by the Federal Financial Institutions Examination Council (“FFIEC”) entitled, “Authentication in

an Electronic Banking Environment,” dated August 8, 2001, and available at <https://www.ffiec.gov/PDF/pr080801.pdf>.

19. Attached as Exhibit 18 is a true and correct copy of a guidance document issued by the FFIEC entitled, “Authentication in an Internet Banking Environment,” dated October 12, 2005, and available at [https://www.ffiec.gov/pdf/authentication\\_guidance.pdf](https://www.ffiec.gov/pdf/authentication_guidance.pdf).

20. Attached as Exhibit 19 is a true and correct copy of a guidance document issued by the FFIEC entitled, “Supplement to Authentication in an Internet Banking Environment,” dated June 28, 2011, and available at <https://www.ffiec.gov/press/pr062811.htm>.

21. Attached as Exhibit 20 is a true and correct copy of a guidance document issued by the FFIEC entitled, “Joint Statement on Destructive Malware,” dated March 30, 2015, and available at <https://www.ffiec.gov/press/pr033015.htm>.

22. Attached as Exhibit 21 is a true and correct copy of the deposition of Paul Ochoa in this case, taken on August 9, 2017, at Miami, FL.

23. Attached as Exhibit 22 is a true and correct copy of the “TURBOGATEWAY SERVICE BUREAU AGREEMENT” between BDA and BServ, Inc., dated April 23, 2009, a document exchanged during discovery under the Bates number BDA00276.

24. Attached as Exhibit 23 is a true and correct copy of the deposition of Maritza Morocho in this case, taken on August 10, 2017, at Miami, FL.

25. Attached as Exhibit 24 is a true and correct copy of BDA’s Supplemental Responses and Objections to Wells Fargo’s Second Set of Interrogatories in this case.

26. Attached as Exhibit 25 is a true and correct copy of the April 1, 2015 BDA Internal Investigation, a document exchanged during discovery under the Bates number BDA00109.

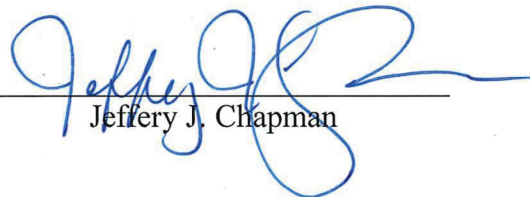


27. Attached as Exhibit 26 is a true and correct copy of the April 1, 2015 BDA Final Report on Systems Audit, a document exchanged during discovery under the Bates number BDA01687.

28. Attached as Exhibit 27 is a true and correct copy of the Expert Report of Mark Rasch submitted by BDA in this case.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: October 2, 2017  
New York, New York

  
Jeffery J. Chapman